

LAW OFFICES of  
SUSAN V. TIPOGRAPH

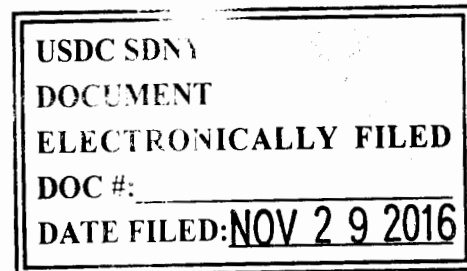
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**FILED BY ECF**

November 22, 2016

Honorable Katherine B. Forrest  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Demetrius Flowers  
Docket No.: 16 Cr. 317 (KBF)



Dear Judge Forrest:

I represent Demetrius Flowers in this matter, having been appointed by this Court on August 30, 2016. I respectfully request that the Court appoint Abraham Hassen as an Associate Counsel, nunc pro tunc to September 1, 2016.

At the time that I was assigned to represent Mr. Flowers, there already was a trial date of February 6, 2017. As the Court is aware, Mr. Flowers is alleged to be the leader of the charged conspiracy and the case involves voluminous amounts of discovery. Further, on August 30<sup>th</sup>, I informed the Court that I had been assigned earlier that day on a multi-defendant RICO matter before Honorable Paul A. Engelmayer, which had a scheduled trial on October 24, 2016.

Given those circumstances, I requested that the Court approve the appointment of an Associate Counsel to assist me. At that time, the Court approved the application and requested that I check with Jerry Tritz's Office. I consulted with the government and was informed that there were four pages of attorneys who would be conflicted out of working with me. I also spoke with Jerry Tritz who informed me that he had no objection to the assignment of Associate Counsel and suggested that they be paid at the presumptive rate of \$85.00 per hour.

Abraham Hassen, a 2014 graduate of New York University Law School, began to work with me. Mr. Hassen was also assigned as Associate Counsel in the case I have before Judge Engelmayer. His work has been invaluable and has concentrated on reviewing the discovery with Mr. Flowers. While I have to review some of the discovery and Mr. Hassen's summaries, I have been able to concentrate on plea discussions and

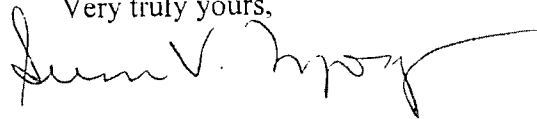
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trial preparation. While there is some "duplicative" work, such as when we meet together, we have tried to keep it to a minimum.

I mistakenly believed that I had made a formal application for Mr. Hassen's appointment as Associate Counsel. Upon reviewing my files, I realized that I had neglected to do so. My apologies to the Court. I am requesting, therefore, that the Court appoint Abraham Hassen, nunc pro tunc to September 1, 2016, for up to 150 hours at a rate of \$85.00 per hour.

Should the Court require any further information, I am happy to provide it. I thank you in advance for your attention and courtesy.

Very truly yours,



Susan V. Tipograph

So ordered.

LCR. Joe  
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11/28/16